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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Cristiano Amparo, an individual; Abel
Millares-Rojas, an individual,

Plaintiffs,

v.

United States of America,

Defendant.

Case No. 2:24-cv-00394-JAD-BNW

**Stipulation and Order to
Extend Certain Discovery Deadlines
(First Request)**

Pursuant to LR IA 6-1 and LR 26-3, the parties request an extension of the January 17, 2025, deadline to disclose initial experts to March 3, 2025, and all other discovery deadlines including joint pretrial order (JPTO) deadlines thereafter, as follows. This extension is made 21 days from the initial expert disclosure deadline. This is the first request for an extension.

DISCOVERY COMPLETED

The parties have completed the following disclosures and discovery:

The parties served their respective initial disclosures.

DISCOVERY REMAINING

There are two plaintiffs in this case. The parties need to serve discovery requests, obtain all of plaintiffs' medical records, retain experts after the medical records are obtained and conduct all necessary depositions.

WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED

The remaining discovery has not been completed due to the parties' heavy workloads, holiday leave schedules and the current change of administration in

Washington, DC which has influenced the budget to retain experts. The parties need the additional time to serve discovery, obtain medical records, retain experts, and conduct depositions. Plaintiffs' counsel agrees to this extension. This request is filed within 21 days of the initial expert disclosure deadline. For these reasons, the parties agreed to the revised schedule below to have the necessary time to complete the discovery in this case.

EXTENSION OF THE DISCOVERY PLAN AND SCHEDULING ORDER

The extension of the remaining deadlines in the case would result in the following revised discovery schedule:

SCHEDULED EVENT	CURRENT DEADLINE	PROPOSED DEADLINE
Close of Discovery	03/17/2025	05/01/2025
Initial Expert Disclosures	01/17/2025	03/03/2025
Rebuttal Expert Disclosures	02/19/2025	04/07/2025 ¹
Dispositive Motions	04/17/2025	06/16/2025 ²
Proposed Joint Pretrial Order	05/17/2025	07/31/2025 ³

This request for an extension of time is not sought for any improper purpose including delay.

Respectfully submitted this 27th day of December 2024.

THE BIG GUNS INJURY ATTORNEYS

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/s/ Virginia T. Tomova
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IT IS SO ORDERED:


 UNITED STATES MAGISTRATE JUDGE

DATED: December 30, 2024

¹ April 5, 2025 is a Saturday.

² June 15, 2025 is a Sunday.

³ If dispositive motions were filed, the deadline for the Proposed Joint Pretrial Order would be deferred until 30 days after the Court rules on the dispositive motions.